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6 | Counsel for Andrea A. Wirum
Trustee in Bankruptcy

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

11 In re Case No. 06-50442-MM
12 CALIFORNIA PLAN, INC., Chapter 7
13 Debtor.

MOTION FOR ORDER AUTHORIZING COMPROMISE

17 Andrea A. Wirum, Trustee in Bankruptcy of the estate of the above Debtor, hereby moves
18 the Court for an order authorizing her to enter into a compromise with Coastal International
19 Airways and Seaborne Virgin Islands.

20 On April 8, 2008, the Trustee served on creditors and other interested parties notice of her
21 intent to enter into a compromise with Coastal International Airways and Seaborne Virgin Islands
22 of claims for avoidance and recovery of fraudulent transfers. An authentic copy of the notice is
23 attached as **Exhibit A** and is incorporated by reference in this motion.

24 By her notice, the Trustee disclosed to creditors her intent to accept the sum of \$435,000
25 cash and withdrawal of the \$3 million proof of claim filed by Coastal International Airways and
26 Seaborne Virgin Islands in full and complete satisfaction of her claims for avoidance and recovery
27 of fraudulent transfers made by the Debtor to them.

1 The terms of the compromise and the Trustee's justification for it are thoroughly described
2 in the Trustee's April 8, 2008, notice.

3 WHEREFORE the Trustee requests entry of an order authorizing her to enter into the
4 compromise with Coastal International Airways and Seaborne Virgin Islands as described in her
5 notice to creditors.

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7 DATED: April 8, 2008

LUCE, FORWARD, HAMILTON & SCRIPPS LLP

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9 By:

Charles P. Maher
Counsel for Andrea A. Wirum, Trustee

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